



**BOULT • CUMMINGS
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T.R.A. DOCKET ROOM

January 9, 2004

The Honorable Deborah Taylor Tate, Chairman
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Implementation of the Federal Communications Commission's Triennial Review
Order – 9 Month Proceeding – Loop and Transport
Docket No. 03-00527

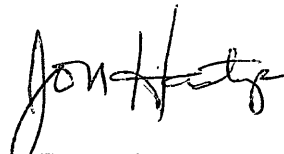
Dear Chairman Tate:

On November 3, 2003 and November 4, 2003 MCImetro Access Transmission Services, LLC and Brooks Fiber Communications of Tennessee, Inc. ("MCI") served data requests and requests for production of documents on BellSouth Telecommunications, Inc. ("BellSouth") pursuant to the then-existing procedural schedule. Subsequent thereto, the Tennessee Regulatory Authority modified the procedural schedule providing for discovery requests to be filed on January 9, 2004 with responses due on January 19, 2004.

Per discussions and agreement with BellSouth, MCI does not intend to re-serve the data requests and requests for production of documents but does request that BellSouth's responses to the November 3rd and 4th data requests/request for production of documents be completed on or before January 19, 2004 pursuant to the modified procedural schedule. MCI further requests that BellSouth also respond to the additional data requests attached hereto.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: 
Jon E. Hastings

JEH/sja

CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2003, a copy of the foregoing document was served on the parties of record, via electronically, US mail or hand delivery:

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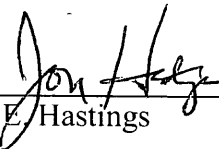
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Jon E. Hastings

**BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE**

In Re: Triennial Review Order – 9 Month)
Proceeding – Loop and Transport) Docket No.: 03-00527

**ADDITIONAL DATA REQUESTS OF MCImetro ACCESS
TRANSMISSION SERVICES, LLC and BROOKS FIBER
COMMUNICATIONS OF TENNESSEE, INC. TO
BELLSOUTH TELECOMMUNICATIONS, INC.**

MCImetro Access Transmission Services, LLC and Brooks Fiber Communications of Tennessee, Inc. (collectively, “MCI”) hereby serves these additional Data Requests to BellSouth Telecommunications, Inc. (“BellSouth”).

MCI-1 Please state whether BellSouth provides CLECs with real-time, read-only access to all data in all BellSouth OSS (including what some ILECs have called back-office systems) related to loop and transport facilities.

MCI-2 To the extent that the response to MCI-1 indicates that CLECs have real time, read-only access to the described data, please provide a detailed description of the manner in which CLECs may access and use all data in BellSouth OSS related to loop and transport facilities on a real-time, read-only basis.

MCI-3 Please provide a list of all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including all of the following: 1) full name of system; 2) acronym for system (if any); 3) detailed description of capabilities and function of system; 4) whether system was developed and is maintained by BellSouth or by third party (and name of third party).

MCI-4 Please provide a schematic drawing showing the interrelationships between all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including but not limited to the following: 1) full name of system; 2) acronym for system (if any).

MCI-5 Please provide a detailed process flow chart for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including but not limited to the following: 1) full name of system; 2) acronym for system (if any).

MCI-6 Please provide a complete set of the current business rules for all OSS used by BellSouth for pre-ordering, ordering, provisioning, maintenance and repair and billing for UNE loop and transport facilities, including but not limited to the following: 1) full name of system; 2) acronym for system (if any).

MCI-7 Please provide, on a wire center basis, detailed information concerning dark fiber in the loop plant that is currently available for use by CLECs.

MCI-8 For each customer location in BellSouth territory identified in your submission in this docket on January 2, 2004 for which CLECs are not impaired without access to BellSouth's Unbundled High Capacity Loops, state and identify:

a. (1) whether the self-provisioning trigger has been met, (2) each capacity level (i.e., DS 3, dark fiber) at which such trigger has been met, (3) the carriers currently deploying loops at such capacity level and, with regard to DS 3 loops, are currently serving customers via those facilities, (4) whether BellSouth has identified the existence of fiber optic facilities and electronics but has not determined the relevant service or capacity provided over those facilities, and (5) all documents, studies, or records showing that the self-provisioning trigger has been met.

b. (1) whether the wholesale provisioning trigger has been met, (2) each capacity level (i.e., DS 1, DS 3) at which such trigger has been met, (3) the carriers currently deploying loops at such capacity level, and which are offering such facility on a widely available wholesale basis, and which have access to the entire customer location, (4) whether BellSouth has identified the existence of fiber optic facilities and electronics but has not determined the relevant service or capacity provided over those facilities, and (5) all documents, studies, or records showing that the wholesale trigger has been met.

MCI-9 For each specific route identified in your submission in this docket on January 2, 2004 for which CLECs are not impaired without access to BellSouth's unbundled transport, state and identify:

a. (1) whether the self-provisioning trigger has been met, (2) each capacity level (i.e., DS 3, dark fiber) at which such trigger has been met, (3) the carriers currently providing each such capacity level, (4) the carriers deploying transport at each such capacity level and, in the case of DS 3 transport, which are operationally ready to use such transport, (5) the "A" and "Z" locations on the route, (5) whether BellSouth has identified the existence of fiber optic facilities and electronics at each endpoint but not determined the relevant service or capacity provided over those facilities, (6) whether BellSouth has not determined whether actual circuits or paths at the relevant capacity are in existence between the two routes, and (7) all documents, studies, or records showing that the self-provisioning trigger has been met.

b. (1) whether the wholesale provisioning trigger has been met, (2) each capacity level (i.e., DS 1, DS 3, dark fiber) at which such trigger has been met, (3) the carriers currently providing each such capacity level, (4) the carriers deploying transport at each such capacity level, and which are operationally ready to use such transport, and which are willing immediately to provide such transport, on a widely available basis, (5) the

“A” and “Z” locations on the route, (6) whether BellSouth has identified the existence of fiber optic facilities and electronics at each endpoint but not determined the relevant service or capacity provided over those facilities, (7) whether BellSouth has not determined whether actual circuits or paths at the relevant capacity are in existence between the two routes, and (8) all documents, studies, or records showing that the wholesale trigger has been met.

MCI-10 For each transport route identified in your response to MCI-9(a) as satisfying the self-provisioning trigger, identify each instance in which BellSouth has provisioned to any of the carriers identified as self-provisioning providers (i) UNE transport, (ii) UNE dark fiber or (iii) special access, between the “A” and “Z” locations on the route. Provide for each carrier, the number of circuits or elements for which BellSouth is currently billing the carrier, the type of service provided (i.e., UNE transport, UNE dark fiber, special access) and the capacity level of each circuit or element provisioned. Please provide any such list in an electronic format that may be manipulated (e.g., Word, Excel).

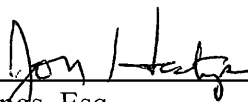
MCI-11 For each transport route identified in your response to MCI-9(b) as satisfying the wholesale provisioning trigger, identify each instance in which BellSouth has provisioned to any of the carriers identified as wholesale providers (i) UNE transport, (ii) UNE dark fiber or (iii) special access, between the “A” and “Z” locations on the route. Provide for each carrier, the number of circuits or elements for which BellSouth is currently billing the carrier, the type of service provided (i.e., UNE transport, UNE dark fiber, special access) and the capacity level of each circuit or element provisioned. Please provide any such list in an electronic format that may be manipulated (e.g., Word, Excel).

MCI-12 State whether collocation space is exhausted in any of the “A” or “Z” locations identified in any of your responses to data requests nos. MCI-9, MCI-10 and MCI-11, and identify with specificity such locations.

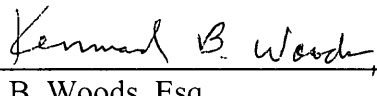
MCI-13 For the past year (or such other time frame dating to and approximately January 1, 2003, as is readily available), state the following information separately for DS1, DS3 and dark fiber transport orders:

- a. The number of LSR’s requesting UNE transport between the “A” and “Z” end points of the routes identified in any of your responses to data requests nos. MCI-9, MCI-10 and MCI-11;
- b. The number of “no facilities” responses BellSouth has returned in response to these LSRs; and
- c. The number of UNE transport or dark fiber circuits provisioned. For each “no facilities” response identified, state the reason given for the “no facilities” response and the estimated time period in which the facility was anticipated to be available.

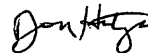
Respectfully submitted,



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*by permission*

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